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5 Attorneys for Plaintiff Stephanie Clifford  
a.k.a. Stormy Daniels a.k.a. Peggy Peterson  
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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

13 STEPHANIE CLIFFORD a.k.a.  
14 STORMY DANIELS a.k.a. PEGGY  
15 PETERSON, an individual,

16 Plaintiff,

17 vs.

18 DONALD J. TRUMP a.k.a. DAVID  
DENNISON, and individual,  
ESSENTIAL CONSULTANTS, LLC, a  
Delaware Limited Liability Company,  
MICHAEL COHEN and DOES 1  
through 10, inclusive,

19 Defendants.  
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CASE NO.: 2:18-cv-02217-SJO-FFM

**PLAINTIFF'S NOTICE OF MOTION  
AND MOTION FOR LEAVE TO  
AMEND TO FILE SECOND  
AMENDED COMPLAINT**

**Hearing Date:** December 3, 2018  
**Hearing Time:** 10:00 a.m.  
**Location:** Courtroom 10C

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on December 3, 2018, in Courtroom 10C of the  
3 above-referenced Court, pursuant to Federal Rule of Civil Procedure 15(a), Plaintiff  
4 Stephanie Clifford a.k.a. Stormy Daniels a.k.a. Peggy Peterson (“Plaintiff”) will and does  
5 hereby move this Court for leave to amend and file a Second Amended Complaint.

6 Plaintiff bases this motion upon this Notice of Motion; the concurrently filed  
7 Memorandum in Support of Plaintiff’s Motion for Leave to Amend, the Declaration of  
8 Ahmed Ibrahim in Support of Plaintiff’s Motion for Leave to Amend, the pleadings and  
9 record in this action; and such further argument and evidence as this Court may consider  
10 at or before the hearing on this motion.

11 On October 26, 2018, Plaintiff filed her Response to Defendant Michael Cohen’s  
12 Special Motion to Strike in which Plaintiff notified Defendant Michael Cohen that she  
13 would be filing this Motion. [Dkt. 90 at 1, 6-7.] On October 29, Plaintiff’s counsel spoke  
14 with Mr. Cohen’s attorney, Brent Blakely, on the phone and advised Mr. Blakely of the  
15 relief sought in this Motion in an effort to meet and confer pursuant to Local Rule 7-3.  
16 [Declaration of Ahmed Ibrahim in Support of Motion for Leave to Amend, ¶3.] The same  
17 day, Plaintiff’s counsel sent a follow up e-mail relating to the meet and confer. [Id. Exh.  
18 C.] Plaintiff’s counsel stated “I am happy to drive up to your office in Manhattan Beach  
19 this afternoon to confer in person.” [Id.] Mr. Blakely advised that he would not be  
20 available to meet and confer in person until Thursday, November 1. [Id., ¶3 Exh. A.] In  
21 the meantime, the parties continued to have meet and confer communications by e-mail.  
22 [Id.] Plaintiff’s counsel and Mr. Blakely then met and conferred in person on November  
23 1. [Id., ¶4.] However, the parties were unable to reach a resolution and Mr. Blakely  
24 confirmed that Mr. Cohen would oppose Plaintiff’s motion. [Id.]

25 Dated: November 5, 2018

AVENATTI & ASSOCIATES, APC

26 By: /s/ Michael J. Avenatti  
27 Michael J. Avenatti  
28 Ahmed Ibrahim

1 Attorneys for Plaintiff Stephanie Clifford  
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